

**STATEMENT OF BASIS (AI No. 26378)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0103021 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Cal Dive International, Inc.  
1902 Diver Drive  
New Iberia, Louisiana 70560

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** February 6, 2008

**1. PERMIT STATUS****A. Reason For Permit Action:**

Issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B.** LPDES permit - LAR05N821  
LPDES permit effective date: March 29, 2007  
LPDES permit expiration date: April 30, 2011

**C.** Date Application Received: July 25, 2007

**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - oilfield service company**

Cal Dive International is an existing facility that stores, maintains, and repairs equipment and marine vessels in support of offshore diving operations.

**B. FEE RATE**

1. Fee Rating Facility Type: minor
2. Complexity Type: II \*BPJ
3. Wastewater Type: III
4. SIC code: 1389, 7389

\* This facility has an SIC Code of 1389 with a corresponding Complexity Type of II (10 points) and an SIC Code of 7389 with a corresponding Complexity Type of I (0 points). However, because of the low volume of washwater discharged, the points have been BPJ'ed to 5.

**C. LOCATION -** 1902 Diver Drive, New Iberia, Iberia Parish  
Latitude 29°56'12", Longitude 91°50'44"

Statement of Basis for  
Cal Dive International, Inc.  
LA0103021, AI No. 26378  
Page 2

### 3. OUTFALL INFORMATION

#### Outfall 001

Discharge Type: equipment washwater  
Treatment: Largale 1050 filtration system including oil/water separator and solids sedimentation  
Location: at the point of discharge from the treatment system located on the north side of the facility (Latitude 29°56'12", Longitude 91°50'44")  
Flow: 0.6 gpd  
Discharge Route: drain pipe thence to Rodere Canal

### 4. RECEIVING WATERS

STREAM - Rodere Canal

BASIN AND SEGMENT - Vermilion-Teche Basin, Segment 060904

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife

### 5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

### 6. COMPLIANCE HISTORY/COMMENTS

#### A. Compliance History

There have been no recent inspections at the facility.

#### B. DMR Review/Excursions

This facility is currently covered under the LPDES Multi-Sector General Permit for Stormwater Discharges Associated With Industrial Activities, Sector I. This sector does not require sampling or analysis of the parameters listed in the sector. It only requires quarterly benchmark monitoring during years 2 and 4 of the general permit. The facility has submitted the results of its benchmark monitoring listed in Sector I and has submitted DMR's. Below are the results of those parameters that were reported at levels above the benchmark monitoring cutoff concentration. Because the facility has had some results above the benchmark concentrations, the Multi-Sector General Permit, will remain in place. By leaving the Multi-Sector General Permit in place, the facility will maintain the requirement for monitoring the benchmark cutoff

Statement of Basis for  
 Cal Dive International, Inc.  
 LA0103021, AI No. 26378  
 Page 3

concentrations as well as be required to maintain and update their Stormwater Pollution Prevention Plan and address any problems which may be occurring with stormwater at the facility. During the next permitting cycle, the results of the benchmark monitoring will be reviewed to determine whether the problems associated with stormwater at the facility have been addressed.

A01 is an outfall designated by the facility.

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Benchmark Concentration</u>
12/07	Zinc	A01	0.378 mg/L	0.12 mg/L
7/07	TSS	A01	136 mg/L	100 mg/L
7/07	Zinc	A01	0.715 mg/L	0.12 mg/L
4/07	TSS	A01	103 mg/L	100 mg/L
4/07	Zinc	A01	0.347 mg/L	0.12 mg/L

A02 is an outfall designated by the facility.

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Benchmark Concentration</u>
12/07	TSS	A02	281 mg/L	100 mg/L
12/07	Zinc	A02	0.422 mg/L	0.12 mg/L
4/07	Zinc	A02	0.171 mg/L	0.12 mg/L

## 7. EXISTING EFFLUENT LIMITS

This facility is currently covered under LPDES Multi-Sector General Permit for Stormwater Discharges associated with Industrial Activities, Sector I.

## 8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 060904 of the Vermilion-Teche Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

## 9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in

Statement of Basis for  
Cal Dive International, Inc.  
LA0103021, AI No. 26378  
Page 4

Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

**10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

**11. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for  
 Cal Dive International, Inc.  
 LA0103021, AI No. 26378  
 Page 5

#### Rationale for Cal Dive International, Inc.

1. Outfall 001 - equipment washwater (estimated flow is 0.6 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max (mg/l)	<u>Reference</u>
Flow	Report: Report	
COD	200:300 mg/L	LPDES General Permit LAG480000 (BPJ)
Oil and Grease	---:15 mg/L	LPDES General Permit LAG480000 (BPJ)
TSS	---:45 mg/L	LPDES General Permit LAG480000 (BPJ)
Soaps & Detergents	Report: ---	LPDES General Permit LAG480000 (BPJ)
Visible Sheen	---: No Presence	LPDES General Permit LAG480000 (BPJ)
pH	6-9 s.u.	LPDES General Permit LAG480000 (BPJ)

**Treatment:** Largale 1050 filtration system including oil/water separator and solids sedimentation

**Monitoring Frequency:** 1/day for visible sheen; 1/quarter for all other parameters at the point of discharge from the treatment system located on the north side of the facility

**Limits Justification:** Limits and monitoring frequency are based on LAG480000, Schedule B and are consistent with existing individual industrial permits for similar facilities.

BPJ Best Professional Judgement  
 su Standard Units

#### NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

#### STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

Stormwater discharged from this facility will be covered under LAR05N821.

#### TMDL/303(d) WATERBODIES

Subsegment 060904 is not listed on LDEQ's Final 2006 303(d) list as impaired. However, subsegment was previously listed for nutrients, suspended solids/turbidity/siltation, organic enrichment/low DO, carbofuran, and phosphorus for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving waterbodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves

Statement of Basis for  
Cal Dive International, Inc.  
LA0103021, AI No. 26378  
Page 6

the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL's have been established for subsegment 060904:

The New Iberia Southern Drainage Canal TMDL's for Dissolved Oxygen & Nutrients was completed April 2002. This facility is not expected to discharge organic enrichment/low DO, phosphorus, and nutrients at a level which would cause or have the reasonable potential to cause or contribute to an excursion above any present state water quality standard.

The TMDL for TSS, Turbidity, and Siltation was completed May 2001. As stated in this TMDL, point sources do not represent a significant source of TSS as defined in this TMDL. Additionally this TMDL does not address the insignificant point source contributions.

The TMDL for the Pesticide Carbofuran was completed March 2002. There is only one point source discharge of carbofuran in the Vermilion-Teche Basin, FMC Corporation Agricultural Products Group. This facility is not expected to discharge carbofuran at a level which would cause or have the reasonable potential to cause or contribute to an excursion above any present state water quality standard.